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3909 Delaware Street Marshalton, DE-19808-5709 Phone (302) 683-9242 Cell (302) 753-4827 BKR0822@aol.com

September 5, 2005

Cohen, Weiss & Simon LLP Attn: Oriana Vigliotti 330 West 42<sup>nd</sup> Street New York, NY 10036-6976

> Re: Brian K Reinbold vs. NALC 1977 US District Court Case # 04-432 (GMS)

Dear Mrs. . Vigliotti,

Please find enclosed my request for interrogatories and documents dated September 5, 2005.

Sincerely,

Sent via certified mail # 7004 1160 0006 3104 1680 w/ return receipt

Cc: Patricia Hannigan US Attorney General 1007 Orange Street Suite 700 P.O. Box 2046 Wilmington, DE 19899-2046 Sent via certified mail #7004 1160 0006 3104 1673 w/return receipt

file

Exhibit 2

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD Plaintiff,

VS.

Civil Action Number 04-432 GMS

**NALC BRANCH 1977** Defendant

## REQUEST OF DOCUMENTS TO DEFENDANTS NALC 1977 PLAINTIFF BRIAN K REINBOLD

Following the civil rules of procedure Plaintiff Brian K Reinbold Request the following documents on the defendants NALC 191% respond in the time frame set by the court.

#### **DOCUMENTS**

- #1. All documents concerning all communications between defendants NALC & USPS written, oral etc... pertaining to the employment of plaintiff.
- #2. All documents concerning all communications between defendants NALC & USPS written, oral etc... pertaining to the discipline of plaintiff.
- #3.All documents concerning all communications between defendants NALC & written, oral etc... pertaining to grievances, days in court, settlements, of plaintiff.
  - #4.All documents concerning all communications between defendants NALC & USPS and Shop Stewards written, oral etc... pertaining to the discipline of plaintiff.
  - #5.All documents concerning all communications between defendants NALC & USPS and Shop Stewards written, oral etc... pertaining to the employment of plaintiff.

Exhibit 2

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- #6. All manuals, SOP's, letters memos pertaining to employment of plaintiff.
- #7. All time, dates, topic of discussions of all floor meetings, one on one meetings pertaining to employment of plaintiff.
  - #8. All statements made for or against plaintiff pertaining to employment or discipline of plaintiff.
  - #9. Copy all grievances and settlements pertaining to discipline of plaintiff.
- #10. All documents, manuals or letters that support your defense of claims made by plaintiff.

Brian K Reinbold 3909 Delaware Street Wilmington, DE 19808-5709 Plaintiff September 5, 2005 Ethibit 2

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD Plaintiff,

vs.

Civil Action Number 04-342 GMS

NALC BRANCH 1977 Defendant

# TO DEFENDANTS NALC 1977 FROM PLAINTIFF BRIAN K REINBOLD

#### **INTERROGATORIES**

Interrogatories #1: Name each person, their title who has information concerning defense to the claims made.

Interrogatories #2: List all positions held by plaintiff and when and where

Interrogatories #3: Specify all meetings, floor talks and conversations held by defendants and plaintiffs as well as parties present and dates and times.

Interrogatories #4: State defendants claims of cause of removal of plaintiff from the USPS.

Brian K Reinbold 3909 Delaware Street Wilmington, DE 19808-5709 Plaintiff September 5, 2005 Ethibit 2

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD Plaintiff,

VS.

Civil Action Number 04-432 GMS

NALC BRANCH 1977 Defendant

#### NOTICE OF SERVICE

I herby state that a request to the above defendants NALC 1977 for the Plaintiffs Interrogatories and Document Request dated September 5,2005 was sent to the USPS attorney in a prepaid envelope

And then certified with a return receipt certified # 7004 1160 0006 3104 1673 on September 6, 2005 to Attn: Patrica Hannigan US Attorney General 1007 Orange Street Suite 700 P.O. Box 2046 Wilmington, DE 19899-2046

Brian K Reinbold Plaintiff September 5,2005 Ethibit 2

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD Plaintiff,

VS.

Civil Action Number 04-432 GMS

**NALC BRANCH 1977** Defendant

## NOTICE OF SERVICE

I herby state that a request to the above defendants NALC 1977 for the Plaintiffs Interrogatories and Document Request dated September 5,2005 was sent to the NALC attorney in a prepaid envelope

And then certified with a return receipt certified # 7004 1160 0006 3104 1680 on September 6, 2005 to Attn: Ohen, Weiss & Simon LLP Attn: Oriana Vigliotti 330 west 42<sup>nd</sup> Street, New York, NY 10036-6976

> Brian K Reinbold Plaintiff September 5,2005